

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**MICHAEL STEBBINS, individually and
on behalf of those similarly situated,**

Plaintiff,

v.

**PETROLEUM EQUIPMENT SERVICES
d/b/a WILDCO PES,**

Defendant.

Civil Action No.: 21-cv-00272

**DEFENDANT’S MOTION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. §1404(a)**

Defendant Petroleum Equipment Services d/b/a Wildco PES (“Wildco PES”), by counsel, and pursuant to 28 U.S.C. 1404(a) respectfully move this Court for an Order to transfer venue for the reasons set forth in the following memorandum attached hereto. In support of this Motion, the Defendant further states as follows:

1. On or about April 2, 2021, Plaintiff filed this class action lawsuit.
2. Plaintiff’s lawsuit arises out of his employment with Defendant Wildco PES in East Rutherford, New Jersey.
3. Defendant Wildco PES now seeks and respectfully requests that this Court transfer venue of the within case for the convenience of the parties and witnesses and in the interests of justice pursuant to U.S.C. §1404 (a).
4. Pursuant to Local Rule 7.1(c), Defendant’s counsel contacted counsel for Plaintiff by phone and email on July 26, 2021, in a good faith attempt to obtain concurrence. However, Plaintiff has not consented to the relief sought.

5. Defendant hereby incorporates and relies upon the attached brief and affidavit in support of this motion attached hereto.

WHEREFORE, Defendant respectfully requests the Court grant this motion and transfer venue to the District of New Jersey.

Respectfully submitted,

Petroleum Equipment Services
d/b/a Wildco PES
By its attorney

/s/ Janet R. Barringer
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Date: July 26, 2021

CERTIFICATE OF SERVICE

I hereby certify that the within document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

Date: July 26, 2021

/s/ Janet R. Barringer
Janet R. Barringer